

**IN THE UNITED DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALEJANDRO GUTIERREZ and)	
ESTELA CARRASCO,)	
)	
Plaintiffs,)	Case No.: 08 C 881
)	
v.)	Judge Holderman
)	
UNKNOWN AND UNNAMED DES PLAINES)	
POLICE OFFICERS, UNKNOWN AND)	
UNNAMED JUNO LIGHTING GROUP, INC.)	
EMPLOYEES, individually, JUNO LIGHTING)	
GROUP, INC and THE CITY OF DES PLAINES,)	
)	
Defendants.)	

Report of Parties Planning Meeting

Plaintiffs Alejandro Gutierrez and Estela Carrasco (collectively referred to as “Plaintiffs”), Defendant The City of Des Plaines (“Des Plaines”) and Defendant Juno Lighting, Inc. d/b/a Juno Lighting Group (“Juno”), by their attorneys hereby submit their Report of Parties Planning Meeting pursuant to the Court’s April 16, 2008 Order:

1. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on April 25, 2008 and was attended by Leslie McCoy for Plaintiffs, Lucy Bednarek for Des Plaines, and Hallie Diethelm Caldarone for Juno.

2. Pre-Discovery Disclosures. The parties will exchange by **May 16, 2008** the information required by Fed. R. Civ. P. 26(a)(1).

3. Discovery Plan. The parties jointly propose to the court the following discovery plan:

a. Discovery will be needed on the following subjects:

i. Liability issues including but not limited to whether Des Plaines or Juno employees can be held liable under Section 1983, and, if so, whether their conduct was in violation of the statutes in question and whether Juno or Des Plaines can be held vicariously liable for its employees’ alleged conduct.

- ii. Damages, including but not limited to any non-economic damages Plaintiffs claim as a result of the alleged conduct.
 - iii. The identities of unknown Defendants.
 - b. Discovery commenced in time to be completed by:
 - i. Plaintiff requests all discovery, including fact and expert discovery, commenced in time to be completed **November 3, 2008.**
 - ii. Defendants request all fact discovery to be commenced in time to be completed by **November 3, 2008.** All discovery, including expert discovery, commenced in time to be completed by **February 16, 2009.**
 - c. Maximum of 25 interrogatories by each party to any other party with responses due 30 days after service
 - d. Maximum of 25 requests for admission by each party to any other party with responses due 30 days after service.
 - e. Maximum of depositions by Plaintiff and by Defendants to be determined. Each deposition limited to maximum of seven (7) hours unless extended by agreement of parties.
 - f. Reports from retained experts under Rule 26(a)(2) due:
 - i. Plaintiff requests reports from retained experts from Plaintiffs be due by **October 1, 2008**, and from Defendants by **November 3, 2008.**
 - ii. Defendants request reports from retained experts from Plaintiff be due by **December 1, 2008**, and from Defendants by **January 15, 2009.**
 - g. Supplementations under Rule 26(e) due within twenty (20) days of discovery of additional information.
- 4. Other Items.
 - a. The parties do not request a conference with the court before entry of the scheduling order.
 - b. The parties request a pretrial conference:

- i. Plaintiff requests a pretrial conference in **March 2009**.
- ii. Defendants request a pretrial conference in **July 2009**.
- c. Plaintiffs should be allowed until **June 30, 2008** to join additional parties and until **June 30, 2008** to amend the pleadings.
- d. Defendants should be allowed until **July 30, 2008** to join additional parties and until **July 30, 2008** to amend the pleadings.
- e. All potentially dispositive motions should be filed by:
 - i. Plaintiff requests all potentially dispositive motions be filed by **December 3, 2008**.
 - ii. Defendants request all potentially dispositive motions be filed by **March 30, 2009**.
- f. Settlement cannot be evaluated until after the depositions of the parties.
- g. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due as determined by the Court in the order setting forth the date for the pretrial order in this matter.
- h. The case should be ready for trial by:
 - i. Plaintiff requests a trial date set in **April 2009** and at this time expects to take approximately three-four (3-4) days.
 - ii. Defendants request a trial date set in **August 2009** and at this time expects to take approximately three-four (3-4) days.

Dated: April 29, 2008

/s/Hallie Diethelm Caldarone

One of the Attorneys for Defendant Juno Lighting, Inc.

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/s/Leslie C. McCoy
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/s/Lucy B. Bednarek
One of the Attorneys for The City of Des Plaines

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NOTICE OF FILING

To: Lucy Bednarek Ancel, Glink, Diamond, Bush DiCianni & Krafthefer PC 140 S. Dearborn Street, 6 th Floor Chicago, IL 60603	Hallie Diethelm Caldarone James F. Botana Carmen B. Cooper Jackson Lewis LLP 320 W. Ohio Street, Suite 500 Chicago, IL 60610
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PLEASE TAKE NOTICE that on April 29, 2008, the undersigned filed with the Clerk of this Court, **REPORT OF PARTIES PLANNING MEETING**, service of which is being made upon you.

s/Leslie C. McCoy
Leslie C. McCoy
ED FOX & ASSOCIATES
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Chicago, IL 60606
(312) 345-8877

PROOF OF SERVICE

I, Leslie C. McCoy, an attorney, under penalty of perjury, and state that on April 29, 2008, service is being made in accordance with the General Order on Electronic Case Filing section XI.

s/Leslie C. McCoy
Leslie C. McCoy